

CAUSE NO. 13-19-00237-CR

IN THE COURT OF APPEALS
FOR THE THIRTEENTH JUDICIAL DISTRICT
AT CORPUS CHRISTI, TEXAS

FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
11/13/2019 12:14:33 AM
DORIAN E. RAMIREZ
Clerk

DALLAS SHANE CURLEE,

APPELLANT,

VS.

STATE OF TEXAS

APPELLEE.

***APPELLANT'S THIRD
MOTION FOR EXTENSION OF TIME***

TO THE HONORABLE COURT OF APPEALS:

COMES NOW, APPELLANT, DALLAS SHANE CURLEE, by and through his attorney of record, Luis A. Martinez, and files this, APPELLANT'S THIRD MOTION FOR EXTENSION OF TIME, and requests that the time for filing his brief be extended by six days (6) days to Monday, November 18, 2019, and as reasonable explanation and request for the extension, would show unto this Honorable Court of Appeals the following:

I.

Appellant's Brief was due on, or about, November 12, 2019.

II.

The undersigned attorney is responsible for the preparation of APPELLANT's Brief.

III.

The facts recited in this motion are apparent in the record, known to the Court, or are within the undersigned's personal knowledge and are true and correct.

APPELLANT's counsel respectfully requests an additional six (6) days to file APPELLANT's brief on the merits. The undersigned is substantially complete with the brief at this time and has been attempting to comply with the last briefing deadline.

Appellant has made some requested additions to the briefing in this matter within the last six days and most recently over the holiday weekend. Appellant's counsel wishes to address them for potential inclusion in his brief, or rule them out, before filing the completed briefing. If the brief can be filed sooner than the six days requested in this motion, the undersigned will file a motion for leave, if the Court of Appeals prefers.

The request for this extension is necessary to properly complete the brief in this matter. This request is not made for delay, but so that justice may be done.

IV.

There have been two previous requests for extension in this matter. Including the days requested for extension of time in this motion (6 days) and the previous motions, the extension of time requested will total 46 days.

V.

The undersigned will confer with the State and see if the State is opposed and report back to the Court.

WHEREFORE, APPELLANT requests this Honorable Court of Appeals to extend the time for filing Appellant's Brief by 6 days to Monday, November 18, 2019, and for such other and further relief to which Appellant is justly entitled.

Respectfully submitted,

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BY:



Luis A. Martinez
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**ATTORNEY FOR APPELLANT
DALLAS SHANE CURLEE**

VII.

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing document was served upon the Honorable Tom Dillard, Assistant Jackson County District Attorney, in the manner indicated below, on this 13th day of November, 2019, pursuant to the Texas Rules of Appellate Procedure.



Luis A. Martinez

Via Electronic Mail

Mr. Thomas Dillard
Assistant District Attorney
Jackson County District Attorney's Office
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Edna, Texas 77957
Attorney for the State on Appeal